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**From:** Sam Harmon <sam\_nole@yahoo.com>  
**To:** <wvogl@samhsa.gov>  
**Date:** 7/6/04 8:00PM  
**Subject:** FR DOCKET NUMBER 04-7984, Mandatory Guidelines

To whom it may concern,

The purpose of this missive is to express my reservation with SAMSHA's proposed guidelines for the use of urinalysis in conducting screening for illegal narcotics.

I do not, nor do I condone in anyway, the use of illegal narcotics; however, SAMSHA's insistence on the use of urinalysis to test for such illicit use is humiliating and barbaric. As you are aware, there is a sizeable segment of the population (7% by some estimates), that is, for one reason or another, unable to urinate in the presence of others. This includes submitting to required urinalyses. This condition, avoidant paruresis, is a psychological disorder that affects its victims physically and to varying degrees. It is not akin to a fear of flying, in which one can will oneself to overcome their fear. This disorder can only be overcome through years of desensitization therapy. Some paruretics may live their lives able to cope with the problem (as I am somehow able), others, live their lives in as recluses in fear.

I submit that employment drug testing is necessary in certain professions and can be achieved through other means; namely, the collection of hair, saliva, blood, etc. These methods of detection are more civilized and humane, and would retain employers' right to demand a test for illegal use of narcotics from its employees.

I urge you to seriously discuss this matter and to find solutions to this very avoidable situation we currently find ourselves in. Thank you for your time.

V/R,

Samuel C. Harmon

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